

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
BRIAN SCOTT GERLACH	:	CASE NO. 1-17-00086-RNO
aka BRIAN S. GERLACH	:	
LAUREN RB GERLACH	:	CHAPTER 13
aka LEAUREN REBECCA GERLACH	:	
fka LAUREN R. SLAUGH	:	
Debtors	:	
	:	
WILMINGTON SAVINGS FUND	:	
SOCIETY, FSB, AS TRUSTEE OF	:	
STANWICH MORTGAGE LOAN	:	
TRUST A	:	
Movant	:	
	:	
v.	:	
	:	
BRIAN SCOTT GERLACH	:	
aka BRIAN S. GERLACH	:	
LAUREN RB GERLACH	:	
aka LEAUREN REBECCA GERLACH	:	
fka LAUREN R. SLAUGH	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF
WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE
OF STANWICH MORTGAGE LOAN TRUST A
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Brian Scott Gerlach and Lauren RB Gerlach, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted in part and denied in part. Debtors have no knowledge as to the Movant. Strict proof is demanded.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The mortgage speaks for itself. Debtors have no knowledge as to whether the Movant is the holder of the mortgage. Strict proof is demanded.

5. Admitted in part and denied in part. Debtors have no knowledge as to the servicer of the mortgage. Strict proof is demanded.

6. Admitted.

7. Admitted. Further, Debtors offer to cure the arrearage through an Amended Plan.

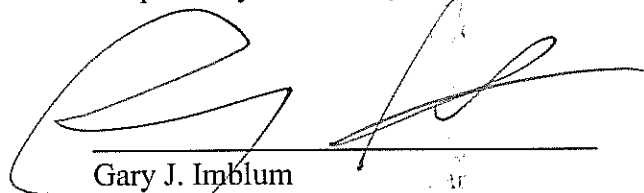
8. Admitted.

9. Denied. Debtors are providing adequate protection through regular post-petition payments. To the extent that the payments are in arrears, Debtors will make an offer in the near future to bring same current.

10. Denied. The amount owed on the mortgage exceeds the fair market value of the property. Accordingly, Movant is not entitled to fees and costs. 11 U.S.C. § 506(b), United Savings Association v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (U.S. Supreme Court 1988).

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtors

DATED: 1/22/19

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF STANWICH MORTGAGE LOAN TRUST A FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

JAMES C. WARMBRODT, ESQUIRE
KML LAW GROUT, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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For Debtors

DATED: 1/22/19